

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
NONRULE POLICY DOCUMENT

Title:	Open Burning of Motor Vehicles for Firefighter Training
Identification Number:	AIR 027 NPD
Date Originally Presented:	April 12, 2001
Date Effective:	May 12, 2001
Dates Revised:	None
Other Policies Repealed or Amended:	None
Brief Description of Subject Matter:	Provides guidance for IDEM and fire departments for conditions upon which approval may be granted for open burning of motor vehicles for purposes of firefighter training under 326 IAC 4-1-4.1.
Citations Affected:	326 IAC 4-1-4.1

This nonrule policy document is intended solely as guidance and does not have the effect of law or represent formal Indiana Department of Environmental Management (IDEM) decisions or final actions of IDEM. This nonrule policy document shall be used in conjunction with applicable laws. It does not replace applicable laws, and if it conflicts with these laws, the laws shall control.

This nonrule policy document may be put into effect by IDEM thirty days after presentation to the appropriate board and after it is made available for public inspection and comment, pursuant to IC 13-14-1-11.5. If the nonrule policy is presented to more than one board, it will be effective thirty days after presentation to the last. IDEM will submit the policy to the Indiana Register for publication. Revisions to the policy will follow the same procedures of presentation to the board and publication.

Policy: IDEM will review and act expeditiously upon requests for variances under 326 IAC 4-1-4.1 for fire training exercises, including the burning of motor vehicles. IDEM recognizes that an important public service is served by providing fire departments the opportunity for training and, especially with respect to motor vehicles, for learning how to investigate the cause of motor vehicle fires. Balanced against this is the valid policy to minimize the amount of air pollution generated by these activities and, in particular, toxic emissions from tires, foam, plastics, fluids and other materials typically found in motor vehicles.

IDEM will act expeditiously on variance requests for motor vehicle open burning where the motor vehicle has been stripped of tires, foam, plastics, fluids, mercury switches, and other materials that generate air pollution.

For requests to burn motor vehicles that have not been stripped, IDEM will use the following factors in considering whether to issue the variance:

- (1) the application for approval of the open burning event is made by a fire department of a local unit (or volunteer fire department) or by a state or regional organization of firefighters for the sole purpose of training firefighters in responding to or investigating vehicle fires;
- (2) personnel specifically trained in responding or investigating motor vehicles fires will be present at the burn; and
- (3) The number of participants or number of fire districts participating.

IDEM encourages that motor vehicle burns be conducted for the benefit of multiple fire departments concurrently and that only those materials needed for the purpose of the training exercise be left in the motor vehicle. IDEM also encourages that amount of materials burned during motor vehicle burns be minimized to the extent necessary to conduct adequate fire training. IDEM also strongly advises that mercury switches be removed prior to burning unless not reasonably possible. The following web site provides a list of vehicles and information on how to find and remove mercury switches:
(<http://www.epa.gov/region5/air/mercury/autoswitch.htm>)

Following are standard conditions that will apply in any variance from 326 IAC 4-1 for open burning of a motor vehicle for fire training purposes:

- (1) No motor vehicle burning shall be conducted during unfavorable meteorological conditions, such as:
 - (A) high winds, temperature inversions, or air stagnation;
 - (B) when a pollution or ozone action day has been declared.
- (2) No motor vehicle burning will be conducted other than in daylight hours and the fire shall be extinguished prior to sunset.
- (3) If at any time the fire creates a threat to public health or a nuisance, the fire shall be extinguished.
- (4) The health department must be notified at least twenty-four (24) hours in advance of the date, time and location of the motor vehicle burning.
- (5) The approval letter shall be made available at the burning site to state and local officials upon request.
- (6) No motor vehicle burning will be conducted within 100 feet of any structure or powerline or other aboveground utility or within 300 feet of a fuel storage area, pipeline, frequently traveled road, or property line of the burn site.
- (7) the motor vehicle burning will be attended at all times by trained fire personnel until completely extinguished.
- (8) All burning must comply with other federal, state, or local laws, regulations, or ordinances.
- (9) mercury switches have been removed from the vehicle and properly recycled or disposed of in a properly permitted municipal solid waste facility, unless the applicant demonstrates that removal is not practicable. It is recommended that the mercury be sent to a local household hazardous waste collection location for recycling or disposal. Please contact your solid waste management district or IDEM (1-800-451-6027) for the location and times for the collection sites.

IDEM will promptly develop an application for open burning approval consistent with this nonrule policy. Questions regarding this nonrule policy document should be directed to the Air Compliance Branch, Office of Air Quality, IDEM, at 317/233-5674 or 1-800/451-6027 ext. 3-5674.